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Counsel for Mr. Motivosyan

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF CALIFORNIA  
(HONORABLE ROGER T. BENITEZ)

UNITED STATES OF AMERICA,

Plaintiff,

v.

ARSEN MOTIVOSYAN,

Defendant.

) U.S.D.C. No. 08CR1455-BEN

) Date: June 30, 2008

) Time: 2:00 p.m.

) NOTICE OF MOTIONS AND MOTIONS TO:

- ) (1) DISMISS INDICTMENT DUE TO  
) MISINSTRUCTION OF THE GRAND JURY;  
) (2) PRESERVE EVIDENCE;  
) (3) COMPEL DISCOVERY;  
) (4) SEVER DEFENDANTS;  
) (5) SUPPRESS STATEMENTS; AND  
) (6) GRANT LEAVE TO FILE FURTHER  
) MOTIONS

TO: KAREN P. HEWIT, UNITED STATES ATTORNEY, AND  
REBECCA KANTER, ASSISTANT UNITED STATES ATTORNEY.

PLEASE TAKE NOTICE that on June 30, 2008, at 2:00 p.m. or as soon thereafter as counsel may be heard, Defendant Arsen Motivosyan, by and through his counsel, Jodi Thorp will ask this Court to enter an order granting the following motions.

**MOTIONS**

Defendant Arsen Motivosyan, by and through his counsel, Jodi D. Thorp, Inc., moves this Court pursuant to the United States Constitution, the Federal Rules of Criminal Procedure, and all other applicable

1 statutes, case law, and local rules for an order to:

- 2 (1) Dismiss Indictment Due to Misinstruction of the Grand Jury;
- 3 (2) Preserve Evidence;
- 4 (3) Compel Discovery;
- 5 (4) Sever Defendants;
- 6 (5) Suppress Statements; and
- 7 (6) Grant Leave to File Further Motions.

8 This motion is based upon the instant motions and notice of motions, the attached statement of facts  
9 and memorandum of points and authorities, the files and records in the above-captioned matter, and any and  
10 all other materials that may come to this Court's attention prior to or during the hearing of these motions.

11 Respectfully submitted,

12  
13 Dated: June 16, 2008

s/ Jodi Thorp  
**JODI THORP**  
Counsel for Mr. Motivossyan